

Amendments to the Drawing Figures:

The attached drawing sheets include proposed changes to FIGs. 1-4 and replace the original sheets including FIGs. 1-4.

Attachment: Two Replacement Sheets

REMARKS / DISCUSSION OF ISSUES

Claims 1-20 are pending in the application. Claims 11-20 are newly added.

The applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority documents.

Claims are amended for non-statutory reasons: to correct one or more informalities, remove figure label numbers, and/or to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added.

The Office action rejects claims 1, 7, 8, 9, and 10 under 35 U.S.C. 102(e) over Kim (USP 6,211,867). The applicants respectfully traverse this claim.

The Examiner's attention is requested to MPEP 2131, wherein it is stated:

"A claim is anticipated only if *each and every element* as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The *identical invention* must be shown in as *complete detail* as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, upon which claims 2-9 depend, claims a display apparatus that includes a drive circuit for providing data arranged in subfields to discharge cells that includes an energy recovery circuit, and means for activating the energy recovery circuit only for a part of the total number of subfields. In like manner, claim 10 claims a method that includes activating an energy recovery circuit only for a part of the total number of subfields.

Kim fails to teach means for activating the energy recovery circuit only for a part of the total number of subfields.

Kim teaches means for controlling the timing of an energy recovery circuit. Kim specifically teaches applying the energy recovery between a first and second time, and does not teach not-applying the energy recovery to a subfield.

As Kim's FIG. 2 illustrates, each subfield includes an address interval and a sustentation interval. Kim's FIG. 4 illustrates the timing within a sustentation interval, wherein the timing of the sustentation voltage sus_V is controlled by controlling an enabling signal erH , as detailed at Kim's column 5, lines 14-54. As taught by Kim, "A size of a time difference Δt between a pulse on time $t1$ of applying control pulse erH and a pulse on time to $[t2]$ of sustentation voltage control pulse $susH$ affects a recycling efficiency of the recovered power" (Kim, column 5, lines 33-37). That is, Kim teaches controlling the timing to increase the recovery efficiency; Kim does not teach or suggest that the recovery should only be performed for some subfields. Kim's timing control occurs during each sustentation interval, and each subfield includes a sustentation interval.

Because Kim fails to teach means for activating the energy recovery circuit only for a part of the total number of subfields, as specifically claimed in claim 1, the applicants respectfully maintain that the rejection of claims 1, 7, 8, 9, and 10 under 35 U.S.C. 102(e) over Kim is unfounded, per MPEP 2131.

The Office action rejects:

claims 2-3 under 35 U.S.C. 103(a) over Kim; and
claims 4-6 under 35 U.S.C. 103(a) over Kim and Salavin (USP
6,123,676).

The applicants respectfully traverse these rejections. Each of these rejected claims is dependent upon claim 1, and in each of these rejections, the Office action relies upon Kim for teaching the elements of claim 1.

MPEP 2142 states:

"To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) **must teach or suggest all the claim limitations**... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

As noted above, Kim fails to teach or suggest means for activating the energy recovery circuit only for a part of the total number of subfields, as specifically claimed in claim 1, and as such, the applicants respectfully maintain that the rejections of claims 2-6 under 35 U.S.C. 103(a) that rely on Kim for this teaching are unfounded, per MPEP 2142.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Attorney
Registration Number 41,508
patents@lawyer.com

1824 Federal Farm Road
Montross, VA 22520
Phone: 804-493-0707
Fax: 215-243-7525